

March 28, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington DC 20554

Re: **COMPLIANCE LETTER**
WC Doc. No. 05-196

Dear Ms. Dortch:

Cameron Communications, L.L.C. (“Cameron”), through undersigned counsel, hereby respectfully submits this “Compliance Letter” in accordance with the Federal Communications Commission’s (“Commission”) Public Notice, *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 (rel. Nov. 7, 2005).

Cameron does not currently provide “Interconnected VoIP Service,” as defined in the Commission’s *VoIP 911 Order*¹ and Commission Rule 9.5, but it has developed and tested a VoIP service offering and will be providing such service in the near future. Therefore, Cameron is filing this Compliance Letter in anticipation of its becoming an interconnected VoIP service provider.

I. 911 Solution.

Cameron will initially offer interconnected VoIP service solely to subscribers within Cameron’s service area in Calcasieu Parish, Louisiana. Cameron will provide 100% of its VoIP customers with 911 service in compliance with the rules established in the Commission’s *VoIP 911 Order*. This statement of compliance assumes that an interconnected VoIP offering which provides E911 capability, but which does not authorize customers to

¹ *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking 20 FCC Red. 10245 (2005) (“*VoIP 911 Order*”)

change locations without updating their Registered Location, or, in any event, to change locations to any place outside of Cameron's service area, will be in compliance with the Commission's rules. Should the Commission rule otherwise, Cameron will revise its statement accordingly.

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- **911 Routing Information/Connectivity to Wireline E911 Network**

Cameron will transmit "all 911 calls to the appropriate PSAP, designated statewide answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."² Specifically, Cameron's softswitch infrastructure is directly connected to the wireline switching facilities of its affiliated incumbent local exchange carrier. Cameron will utilize the wireline network of its affiliated incumbent local exchange carrier to transmit 911 calls to the appropriate Selective Router for the areas served by Cameron, and further to the appropriate trunk groups to transmit such calls to the appropriate PSAP. As previously mentioned, Cameron will initially provide interconnected VoIP service only to subscribers located within its service area located wholly within Calcasieu Parish, Louisiana, and all 911 calls placed by its VoIP subscribers will be transmitted to the Selective Router that serves the Calcasieu Parish, Louisiana PSAP. Cameron is currently interconnected, indirectly, to the Selective Router that serves the Calcasieu Parish, Louisiana PSAP.

- **Transmission of ANI and Registered Location Information**

Cameron will transmit via the Wireline E911 Network, the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing the information. To the best of Cameron's knowledge and belief, 100 % of the PSAPs within Cameron's service area are capable of receiving and processing ANI and Registered Location information that

² *VoIP 911 Order*, 20 FCC Rcd at 10269-70, ¶ 42

Cameron will transmit. 100 % of Cameron's VoIP customers will be able to transmit ANI and Registered Location information to the answering points that are capable of receiving and processing this information.

- **911 Coverage**

Cameron has achieved the capability for full 911 compliance with the *VoIP 911 Order* in all of its service area.

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II. Obtaining Initial Registered Location Information

As previously mentioned, Cameron is not currently providing interconnected VoIP service and therefore has no existing VoIP service subscribers. Once Cameron commences offering interconnected VoIP services, it will obtain the initial Registered Location information from 100% of its VoIP customers when the customer subscribes to the VoIP service and prior to initiation of service.

III. Obtaining Updated Registered Location Information

Cameron will offer interconnected VoIP service only on a fixed basis. Thus, Cameron's customers are required to update their Registered Location whenever they wish to establish a new service address within Cameron's service area. Customers are not authorized to change locations to any place outside of Cameron's service area. Cameron's VoIP customers will be given the following options to update their Registered Location information:

- i. Visit Cameron's customer service office location.
- ii. Call Cameron's customer service department.
- iii. Modify their account information via Cameron's web site

Option ii. offers customers the ability to use the same equipment they use to access their interconnected VoIP service to update their Registered Location.

IV. Technical Solutions for Nomadic Subscribers

As stated above, at this time Cameron will not offer nomadic interconnected VoIP services. While Cameron's VoIP service customers will have the technical ability to relocate their VoIP service equipment to another physical location, Cameron will expressly advise its customers to update their Registered Location anytime they relocate their service within Cameron's service area, and further advise that in no event are they to relocate their service to places outside of Cameron's service area. Subscribers will be made aware of these requirements, and the E911 service limitations that may be associated with their failure to comply with these requirements, by plain and prominent language in the documentation provided to them, including, but not limited to, the subscriber agreement and E911 subscriber advisory and acknowledgement required by the *VoIP 911 Order* and Commission rules.

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V. Automatic Detection Mechanism When Service Is Moved

See response in Section IV. above. In addition, Cameron notes that the *VoIP 911 Order* specifically states that there is no requirement that interconnected VoIP providers automatically determine the location of their end users.³ Cameron does not currently possess such capability and does not intend, at this time, to implement such capability.

Please feel free to contact the undersigned if you have any questions or need additional information.

Respectfully Submitted,

/s/
Marty J. Meche

³ See *VoIP 911 Order*, ¶ 46 & n. 146.

Counsel for Cameron
Communications, L.L.C.

cc: Kathy Berthot
Deputy Chief, Spectrum Enforcement Division, Enforcement Bureau
Federal Communications Commission

Janice Myles
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